

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION**

DENNIS HANSCOM, on behalf of himself and
all others similarly situated,

Plaintiff,

vs.

NORDSEC LTD., NORDSEC B.V., NORDVPN
S.A., NORD SECURITY INC., and TEFINCOM
S.A. d/b/a NORDVPN,

Defendants.

CASE NO. 3:24-CV-00277-KDB-DCK

**DEFENDANT NORD SECURITY INC.’S CONSENT MOTION
FOR EXTENSION OF TIME TO RESPOND TO THE COMPLAINT**

Pursuant to Federal Rule of Civil Procedure 6(b) and Local Rule 7.1, Defendant Nord Security Inc., by special appearance, moves for an extension of time up to and including July 3, 2024, to respond to the Class Action Complaint in this matter. In support, Defendant Nord Security Inc. states as follows:

1. Defendants NordSec LTD., NordSec B.V., NordVPN S.A., Nord Security Inc., and Tefincom S.A. d/b/a NordVPN (collectively “Defendants”) have conferred with Plaintiff about the relief requested in this Motion for Extension of Time to Respond to the Complaint (the “Motion”). Plaintiff consents to the Motion.

2. Plaintiff filed the Class Action Complaint on March 5, 2024. Defendant Nord Security Inc. was served with the Complaint and Summons on March 15, 2024. Under Federal Rule of Civil Procedure 12(a)(1), Defendant Nord Security Inc.’s original deadline to respond to the Complaint was April 5, 2024.

3. On April 5, 2024, Defendant Nord Security Inc. filed a motion to extend its deadline to respond to the Complaint up to and including May 6, 2024, which the Court granted the same

day. Dkt. 16.

4. No other named Defendant had been served by April 5, 2024. All named Defendants other than Nord Security Inc. (collectively the “Foreign Defendants”) are foreign entities located outside the United States.

5. On April 4, 2024, Plaintiff requested that the Foreign Defendants waive formal service of the summons. On April 18, 2024, the Foreign Defendants waived formal service of the summons, extending their time to respond to the Complaint by 90 days from the request for waiver of service, up to and including July 3, 2024.

6. Defendants and their counsel are currently investigating Plaintiff’s claims and gathering the information necessary to respond to the allegations.

7. Extending Defendant Nord Security Inc.’s response deadline to match that of the Foreign Defendants will promote efficiency for the Court and for the parties, including by enabling Defendants to respond at the same time. In addition, it will give all parties adequate time to schedule and conduct a settlement conference before Defendants file a response to the Complaint, in accordance with the Court’s Standing Order. *See* 5:19-mc-5 (Doc. No. 1).

8. Defendant Nord Security Inc. appears solely for purposes of this Consent Motion for Extension of Time. It preserves all defenses, including as to jurisdiction and as available under Rule 12 of the Federal Rules of Civil Procedure, except it waives any objection to the absence of a summons or of service.

Accordingly, in the interest of efficiency, Defendant Nord Security Inc. and Plaintiff jointly request that the Court grant this consent Motion extending Nord Security Inc.’s deadline to respond to the Complaint up to and including July 3, 2024.

Dated: April 24, 2024

Respectfully submitted,

MC GUIREWOODS LLP

/s/ Jodie Herrmann Lawson _____

Jodie Herrmann Lawson
NC State Bar No. 42900
Jessica O'Brien
NC State Bar No. 56679
201 North Tryon Street, Suite 3000
Charlotte, NC 28202
Telephone: (704) 343-2329
Facsimile: (704) 343-2300
jlawson@mcguirewoods.com
jobrien@mcguirewoods.com

FENWICK & WEST, LLP

Jedediah Wakefield*
Ethan Thomas*
Samuel Sahagian*
555 California Street, 12th Floor
San Francisco, CA 94104
Telephone: 415.875.2300
Facsimile: 650.938.5200
Email: jwakefield@fenwick.com
ssahagian@fenwick.com

Adam Gahtan*
902 Broadway, 18th Floor
New York, NY 10010
Telephone: 212.430.2600
Facsimile: 650.938.5200
Email: agahtan@fenwick.com

Counsel for Defendant Nord Security Inc.
**Motion for pro hac vice forthcoming*

CERTIFICATE OF SERVICE

I certify that on April 24, 2024, I electronically filed this Motion with the Clerk of Court using the CM/ECF system, which automatically provides electronic notice to all counsel of record.

/s/ Jodie Herrmann Lawson
Jodie Herrmann Lawson
NC State Bar No. 42900
Counsel for Defendant Nord Security Inc.